

REMARKS / DISCUSSION OF ISSUES

Claims 11-27 are pending in the application. Claim 16 is rewritten in independent form, and independent claim 28 is canceled.

The applicant thanks the Examiner for acknowledging that the drawings are acceptable.

The Office action rejects claims 11-13, 15, 16, 19, and 23-28 under 35 U.S.C. 103(a) over Sony CyberFrame PHD-A55 (Hereinafter CyberFrame), a corresponding product review in TechTV (hereinafter TechTV), "Sony announces memory stick product line to advance imaging applications" (Business Wire, 18 Feb 1999, hereinafter BusinessWire), and Shiota et al. (USP 6,337,712, hereinafter Shiota). The applicant respectfully traverses this rejection.

Independent claims 11, upon which claims 12-15 and 17-18 depend, and claim 19 are each amended to include a PC-interface operable to transfer the digital image to the PC, and to receive a video signal from the PC for display on the display screen. In like manner, claim 23, upon which claims 24-27 depend, is amended to recite that the stand-alone monitor is configured to receive and display video images from a PC

Neither CyberFrame, nor TechTV, nor BusinessWire, nor Shiota teaches a stand alone monitor that also displays video images from a PC. Accordingly, the applicant respectfully requests the Examiner's reconsideration of the rejection of claims 11-13, 15, 19, and 23-28 under 35 U.S.C. 103(a) over CyberFrame, TechTV, BusinessWire, and Shiota.

Claim 16 recites a stand-alone monitor that includes a wireless communications port that wirelessly communicates with a wireless image source to receive a digital image transmitted by the wireless image source to the interface; a controller that processes and transfers the received digital image for display on a display screen of the stand-alone monitor; and a remote control device for wirelessly communicating with the wireless communication port to issue a command to the controller for control of receipt and display of the digital image on the display screen.

Neither CyberFrame, nor TechTV, nor BusinessWire, nor Shiota teaches or suggests a stand alone monitor that includes a remote control device that issues a command to the controller for control of receipt and display of the digital image on the display screen.

The Office action asserts that Shiota teaches that a cell phone issues commands to the controller for control of receipt and display of the digital image on the display screen. The applicant respectfully disagrees with this assertion.

Shiota teaches that a cell phone can be used to provide images to an image server, either directly from its memory, or indirectly by providing modem functionality. Shiota does not teach or suggest that the cell phone is used to control the display of the digital image on the display screen of the image server.

Accordingly, the applicant respectfully requests the Examiner's reconsideration of the rejection of claim 16 under 35 U.S.C. 103(a) over CyberFrame, TechTV, BusinessWire, and Shiota.

The Office action rejects claims 14, 17-18 and 20-21 under 35 U.S.C. 103(a) over CyberFrame, TechTV, BusinessWire, Shiota, and Johnson et al. (USP 6,363,204, hereinafter Johnson). The applicant respectfully traverses this rejection.

In *KSR Int'l. Co. v. Teleflex, Inc.*, the Supreme Court noted that the analysis supporting a rejection under 35 U.S.C. 103(a) should be made explicit, and that it is "important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed:

"Often, it will be necessary ... to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue. To facilitate review, this analysis should be made explicit." *KSR*, slip op. at 14.

The Office action asserts that Johnson teaches a stand-alone monitor, and thus one of skill in the art would have an apparent reason to combine the teachings of Johnson with other teachings related to stand-alone monitors. The applicant respectfully disagrees with this assertion.

Johnson teaches a conventional computer monitor, and does not teach a stand-alone monitor. The Office action references Johnson's column 5, lines 48-56, FIG. 3, column 7, lines 24-26, and column 8, lines 1-31. In each of these cited segments, Johnson addresses a monitor that is driven by a PC. Johnson's column 5, lines 48-56 addresses Johnson's FIG. 4, which clearly illustrates a computer subsystem 415 driving a display monitor subsystem 410. Johnson's FIG. 3 illustrates a conventional consumer television set 304 coupled to a DVD player 302. Johnson's column 7, lines 24-26 address Johnson's FIG. 5, and column 8, lines 1-31 address Johnson's FIG. 6. Each of Johnson's FIGs. 5 and 6 illustrate a monitor 506 that is driven by a computer subsystem 415.

Because none of the cited references to Johnson teach or suggest a stand-alone monitor, as relied upon in the rejection of claims 14, 17-18 and 20-21 under 35 U.S.C. 103(a) over CyberFrame, TechTV, BusinessWire, Shiota, and Johnson, the applicant respectfully requests the Examiner's reconsideration of this rejection.

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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